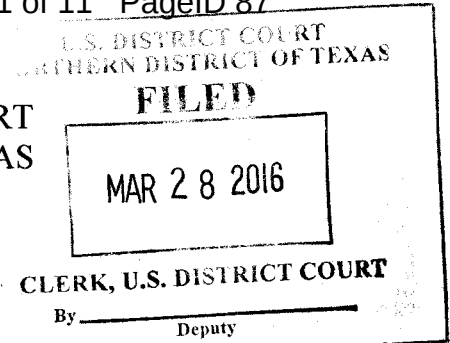


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:16-MJ-162

RONDALYN JOY ADDISON	
a/k/a/ "Ronnie"	(01)
SHAWN DOUGLAS CROPP	(02)
KACEY CROXTON	(03)
STEPHANIE ANN HATLEY	(04)
MICHAEL CLAY HEASLET	(05)
MICHAEL JORDAN	
a/k/a "Junebug"	(06)
LARRY DANIEL MAXEY	(07)
JAMES ALLEN OWENS	
a/k/a "Little James"	(08)
TRAE SHORT	
a/k/a "Twig"	(09)

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2015, and continuing until on or about April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Rondalyn Joy ADDISON**, also known as Ronnie, **Shawn Douglas Cropp**, **KACEY CROXTON**, **Stephanie Ann HATLEY**, **Michael Clay HEASLET**, **Michael JORDAN**, also known as Junebug, **Larry Daniel MAXEY**, **James Allen OWENS**, also known as Little James, and **Trae SHORT**, also known as Twig, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 17 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.

2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the

nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Rondalyn Joy ADDISON**, also known as Ronnie, **Shawn Douglas Cropp**, **KACEY CROXTON**, **Stephanie Ann HATLEY**, **Michael Clay HEASLET**, **Michael JORDAN**, also known as Junebug, **Larry Daniel MAXEY**, **James Allen OWENS**, also known as Little James, **and Trae SHORT**, also known as Twig, along with others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Rondalyn Joy ADDISON**, also known as Ronnie, **Shawn Douglas Cropp**, **KACEY CROXTON**, **Stephanie Ann HATLEY**, **Michael Clay HEASLET**, **Michael JORDAN**, also known as Junebug, **Larry Daniel MAXEY**, **James Allen OWENS**, also known as Little James,

and Trae SHORT, also known as Twig, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Rondalyn Joy ADDISON**, also known as Ronnie, **Shawn Douglas Cropp**, **KACEY CROXTON**, **Stephanie Ann HATLEY**, **Michael Clay HEASLET**, **Michael JORDAN**, also known as Junebug, **Larry Daniel MAXEY**, **James Allen OWENS**, also known as Little James, **and Trae SHORT**, also known as Twig, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general **Nicole Cynthia HERRERA** and others distributed methamphetamine to **Lori Jean CROSS**, **Michael Christopher HOFMAN**, **Raul RANGEL**, **Drew Justice WINDSOR** and others who then re-distributed or brokered methamphetamine transactions between and amongst others.

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On March 17, 2015, Agents/Officers with Homeland Security and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at 1002 Cotton Wood Dr., Benbrook, Texas, and arrested Gavin Seguin.
- b. Arrest of Shanda Hawkins, on March 27, 2015, on an outstanding Federal Arrest Warrant.
- c. On June 12, 2015, Officers from the Wichita Falls Police Department arrested Michael Bentley on an outstanding Federal Arrest Warrant.
- d. On June 15, 2015, Agents/Officers from the Drug Enforcement Administration and the United States Marshal's Service arrested Edwin Romine on an outstanding Federal Arrest Warrant.
- e. On August 7, 2015, Agents/Officers from the Irving Police Department and the United States Marshal's Service arrested Matthew Rutledge on an outstanding Federal Arrest Warrant.
- f. On November 13, 2015, Agents/Officers with the Texas Department of Public Safety arrested Cooperating Defendant-1 (CD1) on an outstanding Federal Arrest Warrant.
- g. On September 21, 2015, Agents/Officers with Homeland Security arrested Cooperating Defendant-2 (CD2) on an outstanding Federal Arrest Warrant.
- h. On November 13, 2015, Agents/Officers with the Texas Department of Public Safety arrested Cooperating Defendant-3 (CD3) on an outstanding Federal Arrest Warrant.
- i. Arrest of CD4 on February 4, 2016, by Agents/Officers with the Bureau of Alcohol, Tobacco, Firearms, and Explosives.
- j. Arrest of CD5 on June 12, 2015, by Agents/Officers with the Texas Department of Public Safety.

- k. Arrest of CD6 on October 28, 2015, by Agents/Officers with the Drug Enforcement Administration.
 - l. Arrest of **Shawn Douglas CROPP** and **Stephanie Ann HATLEY** on December 15, 2015, by the Fort Worth Police Department and the seizure of approximately \$11,344.00 U.S. Currency, 32.5 grams of methamphetamine, and drug paraphernalia.
 - m. Non-Custodial interview of **Kacie CROXTON**, on January 8, 2016, by Agents/Officers with the Texas Department of Public Safety.
 - n. Custodial interview of **Larry Daniel MAXEY** on January 14, 2016, by Agents/Officers with the Texas Department of Public Safety.
 - o. Arrest of **Shawn Douglas CROPP** and **Stephanie Ann HATLEY** on January 20, 2016 by the Fort Worth Police Department and the seizure of approximately 555 grams of methamphetamine.
 - p. Custodial interview of Eric Lee Overstreet on February 4, 2016, by Agents/Officers with the Bureau of Alcohol, Tobacco, Firearms, and Explosives.
12. Co-conspirator **Larry Daniel MAXEY** identified **Rondalyn Joy ADDISON** as a methamphetamine distributor whom he (**MAXEY**) had witnessed in possession of approximately one (1) pound of methamphetamine on between three (3) to five (5) different occasions. Specifically, **MAXEY** said that he (**MAXEY**) and others travelled to the Dallas/Fort Worth area two (2) to three (3) times per week to obtain methamphetamine for **ADDISON** and purchased one-quarter (1/4) pound quantities of methamphetamine each trip beginning in approximately July 2014 and ending in approximately December 2014. **MAXEY** identified **ADDISON's** source of supply of methamphetamine as Edwin T. Romine, a/k/a ET. Co-conspirator **KACEY CROXTON** confirmed that **MAXEY** was involved in distributing methamphetamine.

Specifically, **CROXTON** identified **ADDISON** as a distributor of multi-ounce quantities of methamphetamine. **CROXTON** said that between November 2014 and approximately April 2015 she (**CROXTON**) resided with **ADDISON** and that during that time **ADDISON** provided **CROXTON** with approximately one (1) ounce quantities of methamphetamine on a daily basis. **CROXTON** also identified **ADDISON**'s last known methamphetamine source of supply as **James Allen OWENS**.

13. Cooperating Defendant-1 (CD1) identified **Shawn Douglas CROPP** as a methamphetamine distributor whom she (CD1) had witnessed receive eight (8) ounces of methamphetamine and twenty (20) ounces of GHB from another co-conspirator in July 2015. Additionally, CD1 said that she (CD1) witnessed **CROPP** pay four thousand five hundred dollars (\$4,500) for the narcotics. Cooperating Defendant-2 (CD2) confirmed that **CROPP** was involved in distributing methamphetamine. Specifically, CD2 said that on at least ten (10) occasions in 2015 he (CD2) and **CROPP** put their money together to purchase kilogram quantities of methamphetamine. On January 20, 2016, **Shawn Douglas CROPP** and **Stephanie Ann HATLEY** were arrested by the Fort Worth Police Department in possession of approximately 555 grams of methamphetamine.

14. Cooperating Defendant-3 (CD3) identified **Kacey CROXTON** as a methamphetamine distributor to whom he (CD3) had supplied multi-ounce quantities of methamphetamine on multiple occasions in 2015. Additionally, CD3 said that on one (1) occasion **CROXTON** obtained approximately eight (8) ounces of methamphetamine from co-conspirator Mathew Rutledge and then she (**CROXTON**) then distributed those

same eight (8) ounces of methamphetamine to **Rondalyn Joy ADDISON**. On January 8, 2016, **CROXTON** was interviewed by Agents/Officers with the Texas Department of Public Safety (DPS) and admitted to her participation in distributing methamphetamine.

15. On December 15, 2015, officers with the Fort Worth Police Department arrested **Shawn Douglas CROPP** and **Stephanie Ann HATLEY** in possession of approximately \$11,344.00 U.S. Currency, 32.5 grams of methamphetamine, and drug paraphernalia. On January 20, 2016, officers with the Fort Worth Police Department arrested **Shawn Douglas CROPP** and **Stephanie Ann HATLEY** in possession of approximately 555 grams of methamphetamine.

16. Cooperating Defendant-4 (CD4) identified **Michael Clay HEASLET** as a methamphetamine distributor from whom he (CD4) had on at least five (5) occasions in 2015 purchased one-half ($\frac{1}{2}$) kilogram of methamphetamine. CD1 confirmed that **HEASLET** was involved in distributing methamphetamine. Specifically, CD1 said that on one occasion in 2015 she (CD1) witnessed a co-conspirator deliver one (1) pound of methamphetamine to **HEASLET** and another person; of that one pound of methamphetamine, the other person received four (4) ounces, **HEASLET** received four (4) ounces, and **CROPP** received the remaining eight (8) ounces. Additionally, CD1 said that she observed **HEASLET** deliver methamphetamine to another customer on at least five (5) to six (6) occasions in 2015.

17. Co-conspirator Shanda Hawkins identified **Michael Jordan** as a methamphetamine distributor to whom she (Hawkins) and co-conspirator Gavin Seguin, in 2014, had delivered two (2) ounces of methamphetamine on approximately two (2) occasions, 1/8 ounce of methamphetamine approximately four (4) to five (5) times each week for approximately two (2) months, and 1/8 ounce of methamphetamine approximately twice a week for approximately six (6) months. CD2 confirmed that **JORDAN** was involved in distributing methamphetamine. Specifically, CD2 said that, in 2015, on two (2) occasions, **JORDAN** purchased one (1) ounce of methamphetamine from him (CD2).

18. On January 14, 2016, **Larry Daniel MAXEY** was interviewed by Agents/Officers with the Texas Department of Public Safety (DPS) and admitted to her participation in distributing methamphetamine. Numerous other co-conspirators from the Montague County area confirmed that **MAXEY** was involved in distributing methamphetamine. Specifically, the co-conspirators, nearly uniformly, said that **MAXEY** is a large methamphetamine source of supply in the Montague, County, Texas area.

19. Cooperating Defendant-5 (CD5) identified **James Allen OWENS** as a methamphetamine distributor who, in 2014 and 2015, supplied methamphetamine to co-conspirator Michael Bentley and CD5, and others. CD5 said that on at least one (1) occasion in 2014 she (CD5) traveled to Fort Worth, Texas, with Bentley when Bentley received approximately one (1) kilogram of methamphetamine from **OWENS**.

Additionally, she (CD5) said that she had traveled to Fort Worth, Texas, with **OWENS** on approximately five (5) occasions in 2015 to receive an unknown, but large amount of

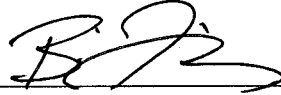
Criminal Complaint – Page 9

methamphetamine from **OWENS's** source of supply. Cooperating Defendant-4 (CD4) Eric Overstreet confirmed that **OWENS** was involved in distributing methamphetamine. Specifically, CD4 said that Michael Bentley and **OWENS** were methamphetamine-distribution partners. Specifically, CD4 said that on at least ten (10) occasions in 2015 he (CD4) had purchased four (4) ounce quantities of methamphetamine from Bentley and **OWENS**. Additionally, CD4 said that both Bentley and **OWENS** possessed a gun every time he (CD4) saw Bentley and **OWENS**.

20. Cooperating Defendant-6 (CD6) identified **Trae SHORT** as a methamphetamine distributor to whom he (CD6) had, in 2015, on approximately five (5) occasions delivered approximately 500 grams of methamphetamine. CD6 said that **SHORT** had purchased as much as \$25,000-worth of methamphetamine from him (CD6) at one time. CD4 confirmed that **SHORT** was involved in distributing methamphetamine. Specifically, CD4 said that on one (1) occasion in 2015 he witnessed **SHORT** and an unknown female receive one (1) kilogram of methamphetamine from Michael **HEASLET**.

21. Based on the foregoing, the Complainant believes that probable cause exists that **Rondalyn Joy ADDISON**, also known as Ronnie, **Shawn Douglas Cropp**, **KACEY CROXTON**, **Stephanie Ann HATLEY**, **Michael Clay HEASLET**, **Michael JORDAN**, also known as Junebug, **Larry Daniel MAXEY**, **James Allen OWENS**, also known as Little James, and **Trae SHORT**, also known as Twig,

along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 10:30 pm, this 28th day of March, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge